

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO**

**NATIONAL ASSOCIATION FOR  
GUN RIGHTS, and FOSTER ALLEN  
HAINES,**

**Plaintiffs,**

**V.**

**MICHELLE LUJAN GRISHAM**, in  
her official capacity as the Governor  
of the State of New Mexico, and  
**PATRICK M. ALLEN**, in his official  
capacity as the Secretary of the New  
Mexico Department of Health,

## Defendants.



**CASE NO.** \_\_\_\_\_

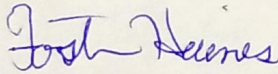
## **SUPPLEMENTAL DECLARATION OF FOSTER HAINES**

1. My name is Foster Haines. I am over the age of 18 and have personal knowledge of the matters set forth in this Declaration.
2. I am submitting this declaration to supplement the declaration I submitted on September 9, 2023.
3. There have been recent media reports that Bernalillo County Sheriff John Allen and Albuquerque Police Chief Harold Medina have declared that they will not enforce the Carry Prohibition (as that term is defined in my September 9, 2023 Declaration) on the ground that it is clearly unconstitutional.
4. However, the Governor's Office has responded to these reports by insisting that even if local law enforcement refuses to enforce the Carry Prohibition, the State

Promises State Police Will Enforce Gun Ban, September 11, 2023 (available at <https://sourcenm.com/2023/09/11/govs-office-promises-state-police-will-enforce-gun-ban/>; last visited September 11, 2023). In this article, the Governor's spokesperson stated: "The order is being enforced, and citations will be forthcoming from the State Police."

Based upon the Governor's assurances that the State Police will enforce the Carry Prohibition even if local law enforcement does not, I continue to fear that I will be issued citations for exercising my constitutional right to lawfully bear arms in public for lawful purposes, including self-defense.

I, Foster Haines, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury that I have reviewed the foregoing, that I am competent to testify in this matter, and that the facts contained therein are true and correct.



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Foster Haines

Date: September 11, 2023